

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ JUL 05 2022 ★

BROOKLYN OFFICE

MISC 22-2084
DECLARATION OF
DMITRY LAPIN, ESQ.

In Re: DMCA Subpoena to Etsy, Inc.

I, Dmitry Lapin, Esq. declare, under penalty of perjury, as follows:

1. I am over the age of 18 and am competent to testify to the matters contained here.

I have personal knowledge of the matters contained in this Declaration.

2. I am an attorney with the law firm of Axenfeld Law Group, LLC. I represent Jon Q. Wright ("Wright"), who owns the copyrights to numerous artwork, including, but not limited to the following:

- | | |
|--|---|
| a. Legends Series Artwork: Bass (VA-153-615) | g. Sunray Bluegill (VA 2-087-516) |
| b. Airborne Bass (VA-1-957-011) | h. Crappie and Root (VA 2-303-553) |
| c. Action Series: Bass Spinner (Vau-348-036) | i. Smallmouth Bass and Topwater Bair (VA 2-160-537) |
| d. JQ Fish Art (VAu-1-021-822) | j. Bass Spinner and Log (VA 2-302-584) |
| e. Walleye Spinner Rig (VA 2-151-863) | k. Northern & Bucktail (VAu-214-078) |
| f. 2000 Unpublished Apparel Series (VAu-486-561) | l. Crappie Dock Painting (VA-1-957-012) |

3. The Etsy Website is owned and operated by Etsy, Inc. (“Etsy”) and functions as an online marketplace whereby users can post a variety of items for sale to consumers.

4. Wright discovered a large number of individuals/entities using www.etsy.com (the “Etsy Website”) to sell, offer for sale, or otherwise display Wright’s copyrighted works without his consent.

5. Attached as **Exhibit A** to this Declaration are true and correct copies of the takedown notifications sent to Etsy, pursuant to 17 U.S.C. § 512(c)(3).

6. Wright seeks to subpoena Etsy for documents containing identifying information relating to the identity of the individuals/entities that posted the unlawful material on the Etsy Website.

7. Attached as **Exhibit B** to this Declaration is an itemized list of all Listing IDs and Storefronts reported to Etsy; Wright requests the identities of the individuals/entities that sold, offered for sale, or otherwise displayed Wright’s copyrighted works by and through these Listing IDs and Storefronts.

8. The sole objective of the issuance of a subpoena on Shopify is to obtain the identity of the alleged infringers, and such information will only be used for the purpose of protecting Wright’s rights under 17 U.S.C. § 101, et seq.

Dated: June 29, 2022

/s/ Dmitry Lapin
Dmitry Lapin

EXHIBIT A

From: Etsy Legal legal@etsy.com
Subject: We've processed your notice of alleged copyright infringement
Date: April 4, 2022 at 7:50 PM
To: dmitry@emilyesquire.com



Dear Dmitry Lapin,

Thank you for submitting a report of alleged copyright infringement on April 4, 2022. In accordance with our Intellectual Property Policy, we removed the reported content based on the information you provided and contacted the affected members.

If you submitted a report of copyright infringement, the sellers you reported have the option to file a DMCA counter notice. Please read our [DMCA counter notice policy](#). If a counter notice is filed, you may want to try working this out with the other party directly or speak with an attorney about this. When we receive a counter notice that contains all of the information required under the Digital Millennium Copyright Act and complies with our policies, Etsy must process it in accordance with our Intellectual Property Policy.

Since Etsy is a venue, we're not in a position to make legal determinations on infringement allegations or take sides in these matters.

Thank you,
Etsy Legal

Below is a copy of the removed content for your records.

Infringing Material Reported

<https://www.etsy.com/listing/1179975974/20oz-skinny-tumbler->

sublimation-design

<https://www.etsy.com/listing/1137199334/20-oz-skinny-tumbler-wrap-fishing>

<https://www.etsy.com/listing/1197474921/20oz-skinny-tumbler-sublimation-design>

<https://www.etsy.com/listing/1184261520/20oz-skinny-tumbler-sublimation-design>

<https://www.etsy.com/listing/1162650610/fishing-i-got-a-fever-and-the-only>

<https://www.etsy.com/listing/1201775255/20oz-skinny-tumbler-sublimation-design>

<https://www.etsy.com/listing/1202405651/20oz-skinny-tumbler-sublimation-design>

<https://www.etsy.com/listing/1013373952/id-rather-be-fishing-tumblersublimated>

<https://www.etsy.com/listing/1058874471/fishing-knowledge-split-fish-file-for>

<https://www.etsy.com/listing/1198788007/20oz-skinny-tumbler-sublimation-design>

<https://www.etsy.com/listing/1188266897/20oz-skinny-tumbler-sublimation-design>

<https://www.etsy.com/listing/1171229828/20oz-skinny-tumbler-sublimation-design>

This is a confidential matter, and Etsy requests that you not discuss this issue in the Etsy Forums or otherwise violate the confidential nature of this email. This communication is not legal advice or legal representation. For legal help, please consult an attorney.

If you live in North America or South America, this email is sent by Etsy, Inc., 117 Adams Street, Brooklyn, NY 11201, USA; if you live elsewhere, this email is sent by Etsy Ireland UC, a subsidiary of Etsy, Inc., 66/67 Great Strand Street, Dublin 1, D01 RW34, Ireland having company registration number 495696 and VAT registration number IE9777587C. You are receiving this email because you

are listed on Etsy as a contact for the seller of the item in question.



Dmitry Lapin <dmitry@emilyesquire.com>

We've received your copyright infringement report

1 message

Wed, Apr 27, 2022 at 2:15 PM

Etsy Legal <legal@etsy.com>
Reply-To: Etsy Legal <legal@etsy.com>
To: dmitry@emilyesquire.com



Dear Dmitry Lapin,

Thanks for submitting a report of alleged copyright infringement. We'll review your report and act in accordance with our Intellectual Property Policy.

Thank you,
Etsy Legal

Below is a copy of the report for your records.

Infringement Report

Filed on April 27, 2022

Legends Series: Bass copyright

Copyright

registration VA-1-153-915
number:

Copyright
jurisdiction: United States

Authorized Work is not available online. "Legends Series Artwork: Bass" depicts a
examples bass jumping from the water, including a detailed design of water. The
of the work:

emilyesquire.com Mail - We've received your copyright infringement report
copyright registration deposit materials are available by contacting
dmitry@emilyesquire.com.

Infringing material reported

1033034521
816948874
1206546612
1160066560
992819743
1147416432
1120480903
1219190873
1193925417
1179923260
1064524227
1028308261
1196943977
715775274
1114348271
962002739
730093137
1156960538
1170228683
911370231
1131623985
1199904204
1113006324
1051124627
1171512256
1207429337
1058720353
1108136994
1161775466
848137755
1168904692
1124355795
1026547806
1053165723
1031854777
785139936

1162265405
1175560757
1087506745
1115029585
1167943135
841883405
1180838521
1116235834
1110533361
1011617393
1097338287
1051529167

By submitting this notice, you agreed to the following statements and provided your signature:

I have a good faith belief that the material is not authorized by the intellectual property owner, its agent, or the law.

The information provided in the notice is accurate, and I swear under penalty of perjury that I am authorized to make the complaint on behalf of the intellectual property owner.

Etsy may provide a copy of this notice to the affected member(s).

Contact Info

Name: Dmitry Lapin
Company: Danchuk Law LLC
Job title: Attorney
Country: United States
Address: 2 Victoria Lane
City: Falmouth
State: Maine
Postal code: 04105

4/27/22, 2:17 PM

emilyesquire.com Mail - We've received your copyright infringement report

Email: dmitry@emilyesquire.com

Phone number: 2074640099

This is a confidential matter, and Etsy requests that you not discuss this issue in the Etsy Forums or otherwise violate the confidential nature of this email. This communication is not legal advice or legal representation. For legal help, please consult an attorney.

If you live in North America or South America, this email is sent by Etsy, Inc., 117 Adams Street, Brooklyn, NY 11201, USA; if you live elsewhere, this email is sent by Etsy Ireland UC, a subsidiary of Etsy, Inc., 66/67 Great Strand Street, Dublin 1, D01 RW84, Ireland having company registration number 495696 and VAT registration number IE9777587C. You are receiving this email because you registered on [Etsy.com](https://www.etsy.com) with this email address.

Copyright © 2022 Etsy, Inc, an affiliate of Etsy Ireland UC. All rights reserved.



Dmitry Lapin <dmitry@emilyesquire.com>

We've received your copyright infringement report

2 messages

Etsy Legal <legal@etsy.com>
Reply-To: Etsy Legal <legal@etsy.com>
To: dmitry@emilyesquire.com

Fri, Apr 29, 2022 at 10:18 AM



Dear Dmitry Lapin,

Thanks for submitting a report of alleged copyright infringement. We'll review your report and act in accordance with our Intellectual Property Policy.

Thank you,
Etsy Legal

Below is a copy of the report for your records.

Infringement Report

Filed on April 29, 2022

Airborne Bass Print copyright

Copyright registration number:	VA 1-957-011
Copyright jurisdiction:	United States
Authorized examples of the work:	fineartamerica.com/featured/airborne-bass-jon-q-wright.html

Infringing material reported

993544487

1162278113
1025382979
1174296263

Legends Series Artwork: Crappie copyright

Copyright

registration VA 1-153-915
number:

Copyright

jurisdiction: United States

Authorized**examples****of the work:**

Work is not available online. "Legends Series Artwork: Crappie" depicts a crappie, including a detailed painting of the crappie fish scales, gills, etc. The copyright registration deposit materials are available by contacting dmitry@emilyesquire.com.

Infringing material reported

1174503670
1218701743

Legends Series Artwork: Bass copyright

Copyright

registration VA-1-153-915
number:

Copyright

jurisdiction: United States

Authorized**examples****of the work:**

Work is not available online. "Legends Series Artwork: Bass" depicts a bass jumping from the water, including a detailed design of water. The copyright registration deposit materials are available by contacting dmitry@emilyesquire.com.

Infringing material reported

1209350180
1103545318
987295340
1172608985
1221694227
1012472190
1123261377

843363002

986771370

By submitting this notice, you agreed to the following statements and provided your signature:

I have a good faith belief that the material is not authorized by the intellectual property owner, its agent, or the law.

The information provided in the notice is accurate, and I swear under penalty of perjury that I am authorized to make the complaint on behalf of the intellectual property owner.

Etsy may provide a copy of this notice to the affected member(s).

Contact Info

Name: Dmitry Lapin
Company: Danchuk Law LLC
Job title: Attorney
Country: United States
Address: 2 Victoria Lane
City: Falmouth
State: Maine
Postal code: 04105
Email: dmitry@emilyesquire.com
Phone number: 2074640099

This is a confidential matter, and Etsy requests that you not discuss this issue in the Etsy Forums or otherwise violate the confidential nature of this email. This communication is not legal advice or legal representation. For legal help, please consult an attorney.

If you live in North America or South America, this email is sent by Etsy, Inc., 117 Adams Street, Brooklyn, NY 11201, USA; if you live elsewhere, this email is sent by Etsy Ireland UC, a subsidiary of Etsy, Inc., 66/67 Great Strand Street, Dublin 1, D01 RW84, Ireland having company registration number 495696 and VAT registration number IE9777587C. You are receiving this email because you registered on [Etsy.com](https://www.etsy.com) with this email address.

Copyright © 2022 Etsy, Inc, an affiliate of Etsy Ireland UC. All rights reserved.

Etsy Legal <legal@etsy.com>
Reply-To: Etsy Legal <legal@etsy.com>
To: dmitry@emilyesquire.com

Fri, Apr 29, 2022 at 10:25 AM



Dear Dmitry Lapin,

Thanks for submitting a report of alleged copyright infringement. We'll review your report and act in accordance with our Intellectual Property Policy.

Thank you,
Etsy Legal

Below is a copy of the report for your records.

Infringement Report

Filed on April 29, 2022

Legends Series Artwork: Bass copyright

Copyright

registration VA 1-153-915
number:

Copyright
jurisdiction: United States

Authorized examples of the work: Work is not available online. "Legends Series Artwork: Bass" depicts a bass jumping from the water, including a detailed design of water. The copyright registration deposit materials are available by contacting dmitry@emilyesquire.com.

Infringing material reported

1000735341

[Quoted text hidden]

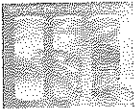

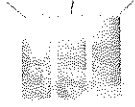



[Quoted text hidden]

Back to all reports

Report: June 16 - Airborne Bass & Action Bass

Status: Reviewed
Date submitted: 06/16/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: Action Series: Bass Spinner, Airborne Bass
Reported listings: 6
Listings removed from Etsy: 6
Listings withdrawn from report: 0
Listings successfully countered: 0

Download listings

Removed (6)	Not removed (0)	Withdrawn (0)
		
<div>Large Mouth Bass Design (3 sizes) Sublimation Waterslide DIGITAL file for 15 20 and 30 oz Tumblers</div> <div>By GlobalDigitalDesigns</div> <div>Status: Removed from Etsy</div> <div>\$4.67</div>		
		
<div>Camo & Bass Color Tumbler</div> <div>By KJTCreationsUS</div> <div>Status: Removed from Etsy</div> <div>\$20.00</div>		
		
<div>Fishing Boat Sublimation Design PNG Digital Download, 20 oz Skinny Tumbler Fishing Knowledge</div> <div>By QuiltingWithMaryAnn</div> <div>Status: Removed from Etsy</div> <div>\$5.27</div>		
		
<div>Fishing Digital File 20z skinny tumbler Sublimation Digital Download PNG</div> <div>By SUBMAMACreations</div> <div>Status: Removed from Etsy</div> <div>\$2.64</div>		
		
<div>Bass Tumbler Cup with Lid, To Go Cup with Straw, Fathers Day Gift From Daughter, Travel Water Bottle, Outdoorsy Gift from Son, Travel Mug</div> <div>By WildOutdoorCreation</div> <div>Status: Removed from Etsy</div> <div>\$31.98</div>		
		
<div>Fishing Digital File 20z skinny tumbler Sublimation Digital Download PNG</div> <div>By SUBMAMACreations</div> <div>Status: Removed from Etsy</div> <div>\$2.64</div>		

[← Back to all reports](#)

Report: Jun 16th 2022, 9:19:24 am

Status: Reviewed
Date submitted: 06/16/22
Intellectual property owner: Jon A. Wright
Intellectual properties: Legends Series Artwork: Bass
Reported listings: 2
Listings removed from Etsy: 2
Listings withdrawn from report: 0
Listings successfully countered: 0

 Download listings

Removed (2)	Not removed (0)	Withdrawn (0)
-------------	-----------------	---------------



Fish American Flag Png, Fishing Heart, Fishing Sublimation Designs Downloads, Father's Day, Digital Download, Sublimation
By Bad3DesignStudio
Status: Removed from Etsy
\$3.70




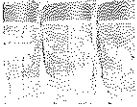
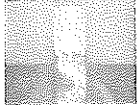

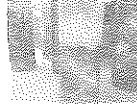
I jerk every chance I get, Fishing, Png File, Sublimation Print
By ChlovelyDesigns
Status: Removed from Etsy
\$3.00

[← Back to all reports](#)

Report: Jun 20th 2022, 2:02:00 pm

Status: Reviewed
Date submitted: 06/21/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: Legends Series Artwork: Bass
Reported listings: 5
Listings removed from Etsy: 5
Listings withdrawn from report: 0
Listings successfully countered: 0

[Download listings](#)

Removed (5)	Not removed (0)	Withdrawn (0)
		
Dad Coffee Mugs Reel Cool Dad Father's Day Gift		
By SouthernBlissStudios		
Status: Removed from Etsy		
\$8.00		
		
12oz stainless steel standard can cooler - Fishing		
By BangenCreations		
Status: Removed from Etsy		
\$23.00		
		
Sunset Bass 20oz Sublimation Skinny Tumbler, Metal Straw		
By TwistedDesignByChay		
Status: Removed from Etsy		
\$20.00		
		
20 oz Skinny Tumbler Sublimation Design Design For Guys Men's Tumbler Design Father's Day Gift Tumbler Wrap		
By BSDesignsOnline		
Status: Removed from Etsy		
\$3.00		
		
Fish tumbler		
By BouncingBeanCreation		
Status: Removed from Etsy		
\$27.00		

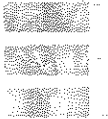
Back to all reports

Report: Jun 21st 2022, 4:13:49 pm

Status: Reviewed
Date submitted: 06/21/22
Intellectual property owner: Jon A. Wright
Intellectual properties: Airborne Bass
Reported listings: 2
Listings removed from Etsy: 2
Listings withdrawn from report: 0
Listings successfully countered: 0

Download listings

Removed (2) Not removed (0) Withdrawn (0)



Fishing Tumbler Design | Sublimation | Gifts for him | Fish
By BcshopCreations
Status: Removed from Etsy
\$3.00



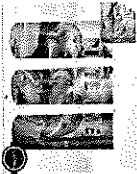
Bass Fishing * 20oz Stainless Steel Tumbler * Fisherman * Fast Shipping
By 3People4ParelGifts
Status: Removed from Etsy
\$22.99

[← Back to all reports](#)

Report: Jun 22nd 2022, 1:03:26 pm

Status: Reviewed
Date submitted: 06/22/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: Legends Series Artwork: Bass, JQ Fish Art: Walleye Green Lure
Reported listings: 1
Listings removed from Etsy: 0
Listings withdrawn from report: 0
Listings successfully countered: 1

[Download listings](#)

Removed (0)	Not removed (1)	Withdrawn (0)
<div></div> <div>20oz Skinny Tumbler, Tumbler Sublimation, Tumbler PNG, Sublimation Designs, Bite Me Fishing, Fishing Tumbler Wrap, Digital Download</div> <div>By LlonPrice</div> <div>Status: Countered by seller</div> <div>\$5.21</div>		

[← Back to all reports](#)

Report: Jun 22nd 2022, 1:05:09 pm

Status: Reviewed
Date submitted: 06/22/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: Legends Series Artwork: Bass, JQ Fish Art: Walleye Green Lure
Reported listings: 1
Listings removed from Etsy: 0
Listings withdrawn from report: 0
Listings successfully countered: 1

 Download listings

Removed (0)	Not removed (1)	Withdrawn (0)
<div><p>20oz Skinny Tumbler, Tumbler Sublimation, Tumbler PNG, Sublimation Designs, Bite Me Fishing, Fishing Tumbler Wrap, Digital Download</p><p>By DABUdesign \$9.32</p><p>Status: Countered by seller</p></div>		

← Back to all reports

Report: Jun 22nd 2022, 12:50:38 pm

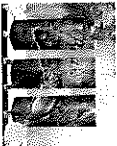
Status: Reviewed
Date submitted: 06/22/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: Action Series: Bass Spinner
Reported listings: 4
Listings removed from Etsy: 0
Listings withdrawn from report: 0
Listings successfully countered: 4

Download listings

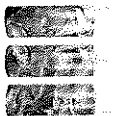
Removed (0)

Not removed (4)

Withdrawn (0)



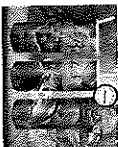
20oz Skinny Tumbler, Tumbler Sublimation, Tumbler PNG, Tumbler Wrap, Tumbler Template, Largemouth Bass, Fishing Tumbler, Digital Download
By Turtled/FishCrafts
Status: Countered by seller \$5.15



Fishing Tumbler, Gifts for Dad, Fishing Gift, Fishing Lure, Fathers Day Gift, Gifts for Him, Skinny Tumbler, Double Wall Tumbler
By Dabber Apparel
Status: Countered by seller \$4.35



20oz Skinny Tumbler, Tumbler Sublimation, Tumbler PNG, Tumbler Template, Largemouth Bass, Fishing Tumbler Wrap, Digital Download
By LeafPicks
Status: Countered by seller \$5.21








20oz Skinny Tumbler, Tumbler Sublimation, Tumbler PNG, Tumbler Wrap, Largemouth Bass, Fishing Tumbler Wrap, Digital Download
By JABUdesign
Status: Countered by seller \$5.22

[← Back to all reports](#)

Report: Jun 24th 2022, 9:40:24 am

Status: Reviewed
Date submitted: 06/24/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: Action Series: Bass Spinner, WALLEYE SPINNER RIG,
Legends Series Artwork: Bass, Airborne Bass, Crappie Dock painting
Reported listings: 5
Listings removed from Etsy: 5
Listings withdrawn from report: 0
Listings successfully countered: 0

[Download listings](#)


Removed (5)	Not removed (0)	Withdrawn (0)
		
Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download		
By SweetandSourGoodies \$7.99 Status: Removed from Etsy		
		
Personalized Fishing Dad 20ozSkinny Tumbler Wrap Seamless Fishing Life Tumbler ,Father's Day, Straight/Warped PNG Instant Download		
By SweetandSourGoodies \$7.99 Status: Removed from Etsy		
		
Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download		
By SweetandSourGoodies \$7.99 Status: Removed from Etsy		
		
Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download		
By SweetandSourGoodies \$7.99 Status: Removed from Etsy		
		
Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download		
By SweetandSourGoodies \$7.99 Status: Removed from Etsy		

[← Back to all reports](#)

Report: Jun 24th 2022, 9:53:44 am

Status: Reviewed
Date submitted: 06/24/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: Action Series: Bass Spinner, Action Fish Paintings Collage
Reported listings: 3
Listings removed from Etsy: 0
Listings withdrawn from report: 0
Listings successfully countered: 3

 Download listings

Removed (0)	Not removed (3)	Withdrawn (0)
	Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download By SweetandSourGoodies Status: Countered by seller \$7.99	
	Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download By SweetandSourGoodies Status: Countered by seller \$7.99	
	Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download By SweetandSourGoodies Status: Countered by seller \$7.99	

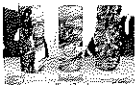
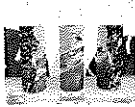



[← Back to all reports](#)

Report: Jun 24th 2022, 9:47:47 am

Status: Reviewed
Date submitted: 06/24/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: 2000 unpublished apparel series: steelhead reel rocks, Northern & bucktail, Fish Paintings Puzzle Collage, 2000 unpublished apparel series: Side Fish Collage, Salmon Stream Print
Reported listings: 5
Listings removed from Etsy: 0
Listings withdrawn from report: 0
Listings successfully countered: 5

[Download listings](#)

Removed (0) Not removed (5) Withdrawn (0)

	Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download By SweetandSourGoodies Status: Countered by seller	\$7.99
	Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download By SweetandSourGoodies Status: Countered by seller	\$7.99
	Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download By SweetandSourGoodies Status: Countered by seller	\$7.99
	Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download By SweetandSourGoodies Status: Countered by seller	\$7.99
	Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download By SweetandSourGoodies Status: Countered by seller	\$7.99




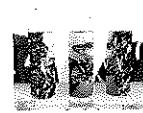

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Report: Jun 24th 2022, 9:50:00 am

Status: Reviewed
Date submitted: 06/24/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: Crappie and Leaves, Smallmouth Bass and Topwater Bait, Crappie and Root, Airborne Bass, Bass Spinner and Log
Reported listings: 5
Listings removed from Etsy: 0
Listings withdrawn from report: 0
Listings successfully countered: 5

[Download listings](#)

Removed (0) Not removed (5) Withdrawn (0)

	Fishing Tumbler 20 oz Skinny Sublimation, Seamless, Fishing Tumbler PNG Digital Download By SweetandSourGoodies Status: Countered by seller	\$7.99
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Report: Jun 29th 2022, 9:02:56 am

Status: Submitted

Date submitted: 06/29/22

Intellectual property owner: Jon Q. Wright

Intellectual properties: Legends Series Artwork: Bass

Reported listings: 6

Download listings



Fish Mug, Fathers Day Gift, Personalized Fisherman Gift, Funny Fishing Mugs, Fish Mug, Bass Fish Coffee Mug, Bass Fishing

By TheDugWhisperer

\$16.95



My weekend hooker fishing png for 20 oz tumblers

By Marrie970

\$2.00



Fishing Don't Be Jealous Catch Fish Like me File Png For Mug, Funny Bass Mug Design, Fishing Lover Dad Mug Design

By Elizabeth1029

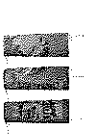
\$2.99



Fishing American Flag 20oz Skinny Tumbler Wrap for Straight/Tapered Tumbler PNG Designs Digital Download Sublimation png file

By MORNINGDESIGNFR

\$3.07



Fishing Rules Tumbler

By WIDOWPOTter

\$23.06



Custom Name on Bass Fishing on Lake print 20oz Straight Skinny Tumbler

By NWAbbyDesign

\$17.93

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Report: Jun 29th 2022, 9:20:14 am

Status: Submitted

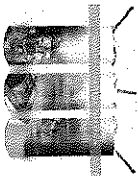
Date submitted: 06/29/22

Intellectual property owner: Jon Q. Wright

Intellectual properties: Airborne Bass

Reported listings: 3

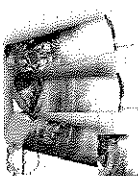
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20 oz Skinny Tumbler Fishing Knowledge Fishing Boat Sublimation Design PNG Digital Download
By FunkyFarm \$5.19



20 oz Skinny Tumbler Fishing Knowledge Fishing Boat Sublimation Design PNG Digital Download
By Boxed4U \$5.10



20 oz Skinny Tumbler Fishing Knowledge Fishing Boat Sublimation Design PNG Digital Download
By HighHopeHootay \$2.99

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Report: Jun 29th 2022, 9:25:44 am

Status: Submitted
Date submitted: 06/29/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: Legends Series Artwork: Bass
Reported listings: 1

 Download listings




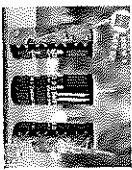
American Flag Bass Fishing Tumbler, men tumblers,
Father's Day gift
By DriftingDogwoodDsgrs \$25.00

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Report: Jun 29th 2022, 9:30:10 am

Status: Submitted
Date submitted: 06/29/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: Fish Paintings Puzzle Collage
Reported listings: 4

 Download listings



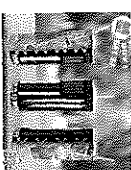
I'd Rather Have A Bad Day Fishing 200z Skinny Tumbler Sublimation,American Flag Tumbler PNG,Father's Day,Bass Fishing PNG Straight & Tapered
By RiskItStreet \$4.98



Fishing Rules 200z Skinny Tumbler Sublimation, Bass Fishing Tumbler Wrap,Fishing Knowledge PNG Straight and Tapered Files
By RiskItStreet \$4.98



I'd Rather Have A Bad Days Fishing 200z Skinny Tumbler PNG - Fishing Tumbler PNG Wrap Sublimation - Straight and Tapered Tumbler PNG
By IsHotStore \$4.98



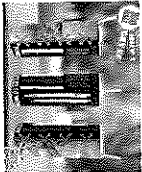
Born To Fish Forced To Work 200z Skinny Tumbler Sublimation,American Flag Tumbler Wrap,Father's Day,Bass Fishing PNG Straight & Tapered
By RiskItStreet \$4.98

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Report: Jun 29th 2022, 9:37:55 am

Status: Submitted
Date submitted: 06/29/22
Intellectual property owner: Jon Q. Wright
Intellectual properties: Airborne Bass
Reported listings: 1

 Download listings



Born To Fish Forced To Work 20oz Skinny Tumbler
Sublimation,American Flag Tumbler Wrap,Father's
Day,Bass Fishing PNG Straight & Tapered
By RiskinStreet
\$4.08

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Report: Jun 29th 2022, 9:45:41 am


Status: Submitted

Date submitted: 06/29/22

Intellectual property owner: Jon Q. Wright

Intellectual properties: Bass and Bluegill

Reported listings: 1

 Download listings



Fishing Rules 20oz Skinny Tumbler Sublimation, Bass
Fishing Tumbler Wrap, Fishing Knowledge PNG
Straight and Tapered Files

By RiskiStreet

\$4.96

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Report: Jun 29th 2022, 9:56:09 am


Status: Submitted

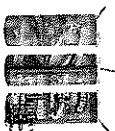
Date submitted: 06/29/22

Intellectual property owner: Jan Q. Wright

Intellectual properties: JD Fish Art: 2 Bass Grouping

Reported listings: 5

 Download listings



Wood Grain Fishing Rules Fishing Tumbler | 20oz
Stainless Steel Tumbler | Sublimation Tumbler

By Bouleestone

\$37.00



Born To Fish Forced To Work 20oz Skinny Tumbler
Sublimation Camo American Flag Tumbler
Wrap, Father's Day, Camouflage PNG Straight &
Tapered

By RiskyStreet

\$4.98



Fishing Rules 20oz Skinny Tumbler Sublimation, Bass
Fishing Tumbler Wrap, Fishing Knowledge PNG
Straight and Tapered Files

By RiskyStreet

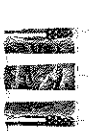
\$4.98



I'd Rather Have A Bad Day Fishing 20oz Skinny
Tumbler Sublimation, American Flag Tumbler
PNG, Father's Day, Bass Fishing PNG Straight &
Tapered

By RiskyStreet

\$4.98



Bass Fish & American Flag Tumbler

By WAGpales

\$22.00

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Report: Jun 29th 2022, 9:57:27 am

Status: Submitted

Date submitted: 06/29/22

Intellectual property owner: Jon Q. Wright

Intellectual properties: Action Series: Bass Spinner

Reported listings: 1

[Download listings](#)



Fishing Rules 200z Skinny Tumbler Sublimation, Bass Fishing Tumbler Wrap, Fishing Knowledge PNG Straight and Tapered Files

By RiskyStreet

\$4.99



Dmitry Lapin <dmitry@emilyesquire.com>

We've received your copyright infringement report

1 message

Etsy Legal <legal@etsy.com>
Reply-To: Etsy Legal <legal@etsy.com>
To: dmitry@emilyesquire.com

Wed, Apr 27, 2022 at 2:15 PM



Dear Dmitry Lapin,

Thanks for submitting a report of alleged copyright infringement. We'll review your report and act in accordance with our Intellectual Property Policy.

Thank you,
Etsy Legal

Below is a copy of the report for your records.

Infringement Report

Filed on April 27, 2022

Legends Series: Bass copyright

Copyright

registration VA-1-153-915
number:

Copyright

jurisdiction: United States

Authorized Work is not available online. "Legends Series Artwork: Bass" depicts a
examples bass jumping from the water, including a detailed design of water. The
of the work:

copyright registration deposit materials are available by contacting

dmitry@emilyesquire.com.

Infringing material reported

1033034521

816948874

1206546612

1160066560

992819743

1147416432

1120480903

1219190873

1193925417

1179923260

1064524227

1028308261

1196943977

715775274

1114348271

962002739

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1116235834
1110533361
1011617393
1097338287
1051529167

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The information provided in the notice is accurate, and I swear under penalty of perjury that I am authorized to make the complaint on behalf of the intellectual property owner.

Etsy may provide a copy of this notice to the affected member(s).

Contact Info

Name:	Dmitry Lapin
Company:	Danchuk Law LLC
Job title:	Attorney
Country:	United States
Address:	2 Victoria Lane
City:	Falmouth
State:	Maine
Postal code:	04105

Email: dmitry@emilyesquire.com

Phone number: 2074640099

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EXHIBIT B

Seller Name/Shop Name	Listing ID
1stchoicedesignpros	1123261377
3PeopleApparelGifts	1123971204
	1016446940
AandJImaginations	1016446940
Abboutique20	1147416432
AllDesignDigital	1137199334
ARX2	957453114
AshlinArtsandThings	1033034521
AshtasticDesigns	1013373952
AshTreeNovelty	1193925417
BabysBureau	1184261520
BadauDesignStudio	957207181
BangenCreations	1195620289
BCshopCreations	1235771758
BnLGifts	1120480903
BoujeeStone	1173545348
BouncingBeanCreation	1121821670
	1170589200
Boxed4U	1170509328
Brittanytaalor	1171229828
BSDesignsOnline	1023476487
CaliberApparel	1086332372
Cilemrasha	1162650610
CnlovelyDesigns	1174223755
	1087506745
	1215416790
COUSTEAUDESIGNE	1070000254
CraftinessBliss	1026547806
CraftsAtOliveBranch	1168506753
CraftyGabbyBoutique	1051529167
CreationByTanya	1011617393
CrossCustomDesigns	993544487
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DABUDesign	1242726109
DeeDeeCreativeDesign	1206546612
DesignsbyEightyEight	1179923260
DigitalBundlesLT	1218701743
DitzyDisasterDecor	1113006324
DriftingDogwoodDsgns	1230010539
DyaniDesignsByDyani	1162278113
Eleven21ind	1027315911
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ElizabethKateCo	816948874
EmillyWhetsell	1156960538
EmperorPutin	1197474921

PersonalCreationss	1172608985
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ProductiveInsomnia	1053165723
PSSTINC	1219190873
PurpleSkyGift	1174503670
QuaranCrafters	1131623985
QuiltingWithMaryAnn	1198788007
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RiskirStreet	
RusticCreekFarmLLC	1108136994
RusticHeartWV	1207429337
SeaPupDesigns	1114348271
SheShedCottage	987295340
ShimmerMeGlimmer	1171512256
SouthernBlissStudios	618597599
SouthernlySweetShop	1116235834
SouthernMerleMama	1058720353
SouthernWHOODesigns	962002739
	1235721938
	1235721902
StoneOakCreatives	
StonePickleandPotato	992819743
strangegifts	1167943135
SUBMAMACreations	1210744862
SubStudios	1209350180
TheGiftSpotTumble	1206084613
TheLeopardLab	1221694227
TheMugWhisperer	1100545939
Tiffanysgrace	1025382979
TinaSouthernGlitz	715775274
TipsyTumblersEtc	841883405
TooSassafrassy	730093137
TwistedDesignByChey	1238034110
WanderwithDawn	1170228683
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WildGypzies	
WildOutdoorCreation	1238527161
Ysaezco	1180838521